

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

PLAINTIFFS' MOTION TO COMPEL

Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited (collectively, "Smartmatic"), by and through their undersigned counsel, hereby move this Court for an order:

1. Compelling Defendants to provide amended responses to Request for Production ("RFP") Nos. 3, 4, 5, 6, 9, 11, 12, 13, 14, 15, 16, and 18 of Smartmatic's First Set of Requests for Production Directed to Defendants Michael J. Lindell and My Pillow, Inc., in which, pursuant to Federal Rule of Civil Procedure 34(b)(2)(C), they identify the portion of the RFP that they deem objectionable and will not comply with, if any, and agree to permit inspection of the remainder of the requested documents;

2. Compelling MyPillow to provide amended responses to RFP Nos. 28 and 29 in Plaintiffs' Second Set of Requests for Production Directed to Defendant My Pillow,

Inc., in which, pursuant to Federal Rule of Civil Procedure 34(b)(2)(C), it identifies the portion of the RFP that it deems objectionable and will not comply with, if any, and agree to permit inspection of the remainder of the requested documents;

3. Compelling Defendants to produce all non-privileged documents in their possession, custody, or control that are responsive to RFP No. 1 of Smartmatic's First Set of Requests for Production Directed to Defendants Michael J. Lindell and My Pillow, Inc.;

4. Compelling Defendants to fully and completely answer Interrogatory Nos. 1, 9, 15 of Smartmatic's First Set of Interrogatories Directed to Defendants Michael J. Lindell and My Pillow, Inc.; and

5. Compelling MyPillow to fully and completely answer Interrogatory Nos. 18, 19, and 22, of Smartmatic's Second Set of Interrogatories Directed to Defendant My Pillow, Inc.

This reasons for this motion are set forth in Smartmatic's Memorandum of Law In Support of Plaintiffs' Motion to Compel and accompanying exhibits.

Dated: February 1, 2023

Respectfully submitted,

/s/ Michael E. Bloom

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